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October 5, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket No. 92-115: Revision of Part 22 of the
Commission's Rules Governing the Public Mobile Services

Dear Ms. Searcy:

Transmitted herewith for filing with the Commission on behalf of the Bell Atlantic Companies are an original and four copies of their "Comments" in the above-referenced rulemaking proceeding.

Should there be any questions with regard to these Comments, please communicate with this office.

Very truly yours,

John T. Scott, III

John T. SCott, III

Enclosures

cc(w/enc): John Cimko, Jr., Chief, Mobile Services Division

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Washington, D.C. 20554

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OCT - 5 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Revision of Part 22 of the)
Commission's Rules Governing)
The Public Mobile Services)

CC Docket No. 92-115

COMMENTS OF THE BELL ATLANTIC COMPANIES

The Bell Atlantic Companies ("Bell Atlantic")^{1/}, by their attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby submit their comments on the Commission's proposed revision of Part 22 of the Rules, set forth in its June 12, 1992 Notice of Proposed Rulemaking in this proceeding.

Bell Atlantic generally supports the Commission's proposals because they will update and improve the organization of the rules. Bell Atlantic also recognizes the effort by Commission staff involved in this rulemaking. In these comments, Bell Atlantic will not discuss changes in the rules with which it agrees. Instead it will focus on those changes that create concerns and will recommend other rule changes that were not addressed in the proposed rules.

1/

These comments are submitted by the Bell Atlantic Telephone Companies (the Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac Telephone Companies, the Diamond State Telephone Company, and the New Jersey Bell Telephone Company), Bell Atlantic Mobile Systems, Inc., the Bell Atlantic Metro Mobile Companies, Bell Atlantic Paging, Inc., and Bell Atlantic Personal Communications, Inc.

Section 22.99 - Definitions

Certain defined terms, such as "fill-in transmitters" and "partitioned MSA", are dependent on final resolution of pending proceedings concerning cellular service, such as the unserved areas rulemaking (CC Docket No. 90-6). The proposed definitions may thus have to be adjusted after completion of these proceedings. With regard to the definition of "fill-in transmitter" for the Paging and Radiotelephone Service, the second sentence of the definition should be clarified to state that a fill-in transmitter may not extend the radio service area or interference contour beyond previously authorized contours.

Certain other terms are not defined and should be. Bell Atlantic recommends that the following definitions be added to Section 22.99:

Contract extension. An agreement between carriers serving adjacent markets which permits one carrier to apply for facilities which will permit one carrier to extend its CGSA into the other carrier's market. One carrier may grant a contract extension to an adjacent carrier for any part of its market during the five-year fill-in period. After the five-year fill-in period has expired, one carrier may grant a contract extension only for area that is within its authorized CGSA.

Contour extension agreement. An agreement between carriers serving adjacent markets which permits one carrier to extend its contours into the other carrier's market, but does not grant the extending carrier any rights to interference protection in the other carrier's market.

Dispatch service. A service using two-way voice communication, normally of not more than one minute's duration, that is transmitted between a dispatcher and one or more land mobile stations, directly through a base station, without passing through the mobile telephone switching facilities.

Definitions of these terms are needed because the terms are used in other substantive rules (see, e.g., 22.901(c) and 22.912). The proposed definition of contract extension reflects current Commission policy regarding agreements between adjacent carriers. The proposed definition of dispatch service is identical to that currently set forth in Section 22.2 but omitted from proposed Section 22.99.

Section 22.101 - Station Files

This proposed rule would state that the Commission's station files, maintained in the Mobile Service Division Public Reference Room, "constitute the official records" for stations licensed under Part 22. To the extent the proposed rule is intended to give these "station files" precedence over data bases, compilations, and other secondary sources, Bell Atlantic has no objection to it. As the Commission is aware, however, those files are often incomplete and sometimes inaccurate or out of date, problems which are exacerbated because the files are available to the public. Section 22.101 should therefore be changed to allow a licensee to show that the station file is not accurate, for example, by providing evidence of a filing or grant that may not be in that file. This is particularly important in view of the Commission's proposal to eliminate Form 489 filings for many minor changes, which would mean that the station file will not necessarily reflect the licensee's authorized operations. Bell Atlantic suggests that the following sentence be added to proposed Section 22.101:

The licensee may, however, demonstrate that the public file is inaccurate or incomplete by providing, e.g., appropriate evidence of a filing or Commission action, by, for example, a stamped receipt copy from the Secretary or the Fees Branch.

Section 22.105 - Written Applications, Standard Forms, Microfiche, Magnetic Disks

Proposed subsection (g) would "encourage" applicants to submit technical and other information on magnetic disks. Bell Atlantic opposes this section on several grounds. First, it would complicate and perhaps delay the ability of the public to obtain information about applications because the public will not in most cases have the necessary equipment to access the information. Second, in the absence of strict standards for disk format, the Commission will inevitably receive multiple formats, complicating its ability to process the information, and further depriving the public of access. Third, most Part 22 filings are short, usually 10 pages or less. The use of magnetic disks for such limited information is not cost-effective.

Bell Atlantic also opposes the proposed requirement that all filings of more than three pages be submitted on microfiche. Currently, only applicants with filings of six or more pages must incur the expense and delay of preparing microfiche copies. The use of microfiche, while cost-effective in terms of record storage for long documents, is not cost-effective for four or five page documents. The cost of preparing the microfiche greatly outweighs the minimal storage requirements for such short documents. Moreover, the use of microfiche has not improved, and has in some respects worsened, the public's ability to obtain copies of

documents from the Public Reference Room. The Commission should continue to permit filings of five pages or less to be submitted in paper form only.

Section 22.108 - Parties to Application

This proposed rule would require all applications to include detailed ownership and other information about the applicant. This would generate substantial and redundant information that the Commission does not need to process the application. Moreover, the Commission's current application procedures do not require that applicants submit such information with every application. An applicant for Part 22 facilities is required to file an FCC Form 430, "Legal Qualifications Report," with its first application (whether to construct facilities, or acquire them through an assignment or transfer of control). Including this information in subsequent applications is an unnecessary paperwork burden on applicants and the Commission. Section 22.108 should thus be revised to add the following language to the first sentence: "provided, however, that the requested information need not be filed if the applicant has previously filed an FCC Form 430."

Section 22.115 - Content of Applications

Paragraph (a)(2) would eliminate the existing requirement to file a vertical profile sketch of the antenna structure when the antenna will be mounted on an existing structure and would not change its overall height. Under current Section 22.15(c), vertical profile sketches are required for all new antennas. The old

rule should be retained. A sketch is important in determining predicted interference and evaluating an applicant's proposal. Submission of the sketch imposes a minimal burden on an applicant which is outweighed by the benefits of providing this information. New Section 22.115(a)(2)'s first two sentences should thus be replaced by the language from current Rule 22.15(c): "Every application for a new antenna, an antenna increased in height, a new antenna structure, or an antenna structure increased in height shall include a vertical profile sketch."

Section 1.122 - Amendment of Applications

Subsection (a) requires that if a formal protest has been filed against an application and/or if the Commission has issued a public notice stating that an application appears to be mutually exclusive with one or more other applications, amendments and other filings must be served on the petitioner and/or the other applicant(s). The rules should be expanded to require that when an applicant knows or should know that its application is mutually exclusive with a prior filed application, the obligation to serve both that application and subsequent amendments starts immediately.^{2/} There is no reason to permit an applicant not to notify those other parties whose authorizations or applications are implicated by the new filing.

^{2/} The current version of FCC Form 401, Schedule B, specifically asks (at item 30) whether a proposed facility is mutually exclusive with any pending application. This item has not been included in the proposed Schedule B on the new Form 401, but should be. Under Bell Atlantic's proposal, if the answer to Question 30 is yes, the service obligation should be triggered.

Subsection (c) addresses amendments to Part 22 applications designated for hearing, but is inconsistent with the procedures contemplated for cellular renewal proceedings, and thus should contain the phrase, "subject to Section 22.935 et seq. governing renewal proceedings in the Cellular Radio Telephone Service."

Section 22.123 - Classification of Filings as Major or Minor

Paging/Radiotelephone services. Proposed Subsection (e)(1), which applies to paging and radiotelephone services, could be read to suggest that any system change which does not result in an increase of any service or interference contour will be treated as a minor change. In these services, it is important that any change in the location or number of transmitters deployed, regardless of whether the change increases the service or interference contours, should be considered as a major change. These services rely on many operating transmitters per defined geographic area. As more new systems are deployed in a given area, frequency coordination and interference studies have become increasingly critical. The basis for most of these studies is data obtained from the application and in the Commission's public notice that the application has been accepted for filing.

The current procedure, which treats the deployment of new transmitters or relocation of existing transmitters as major changes, enables interested parties to study the proposal during the 30-day public notice waiting period, identify potential interference problems, and attempt to resolve them. The applicant itself has an interest in avoiding interference from existing

systems. Were such system changes treated as minor changes, parties would lose the opportunity to resolve any interference issues before the applicant invests resources in construction of the new or modified facility. It would be a waste of the Commission's and the parties' resources to have to address interference problems after a transmitter is authorized. Therefore, subsection (e)(1)(E) should be revised to define a filing in the paging and radiotelephone service as major if it would "relocate an existing fixed transmitter or add any additional transmitter."

Cellular Service. Subsection (e)(2)(i) provides that cellular applications will be deemed "major" filings if they request an authorization that would "(A) establish for the filer a new cellular geographic service area (CGSA) or (B) expand the CGSA of an existing cellular system to include area outside of the cellular market area." This new rule incorrectly treats as "major" types of applications which the Commission determined in CC Docket No. 90-6 to be "minor."

The phrasing in subparagraph (A), "establish for the filer a new" CGSA, is ambiguous. In view of the rule changes adopted in CC Docket No. 90-6, the Commission clearly intends that filings which increase CGSAs, but do not extend beyond the market, made during the five-year fill-in period are to be deemed minor. See Section 22.23(c)(3). A literal reading of "establish a new CGSA" in the proposed rules, however, could include such filings. Subsection (e)(2)(i)(A) should therefore be revised to clarify

that a filing is major if it seeks authority for the initial CGSA in that market.

Similarly, subsection (e)(2)(i)(B) should contain an exclusion for extensions of contours beyond the market pursuant to a letter from the adjacent market licensee. In CC Docket No. 90-6, the Commission adopted a rule that included such a filing within the scope of a minor, permissive change (see Section 22.23(c)(3)), but this subsection appears to reverse that. Subsection (e)(2)(i)(B) should be revised to treat as major only those applications that would:

(B)(1) expand the CGSA of an existing cellular system after the five-year fill-in period for the market has expired, or (2) extend the service contours of an existing station beyond the market, provided that any such extension made pursuant to a contour extension agreement as defined in Section 22.99 shall not be deemed a major change.

Section 22.128 - Dismissal of Applications

Subsection (a) provides that a request by the applicant for dismissal of an application after it has been on public notice is deemed a request for dismissal without prejudice. The status of the dismissal as with or without prejudice should be the same whether the request for dismissal is filed before or after public notice.

Subsection (c)(5) provides that the Commission may dismiss an application as defective if reasonable efforts to coordinate with foreign administrations are unsuccessful. If coordination is unsuccessful, the applicant should be afforded a reasonable period of time to amend the application to accommodate the concerns of

the foreign administration, rather than being dismissed and having to be refiled again.

Section 22.131 - Mutually Exclusive Applications

This section does not refer to the more specific procedures contemplated for cellular renewal proceedings. To avoid inconsistency, it should contain the phrase, "subject to Section 22.935 et seq. governing renewal proceedings in the Cellular Radio Telephone Service."

Section 22.132 - Grants of Applications

The third sentence of subsection (c) requires an applicant issued a conditional grant "to reject the partial or conditional grant and return the instrument of authorization" as the price for filing a petition for reconsideration. Bell Atlantic opposes this requirement because it creates an unnecessary and unfair dilemma for an applicant. This proposal would require an applicant to choose between an unsatisfactory conditional grant and no grant at all if it desires reconsideration, chilling an applicant in exercising its right to seek reconsideration under the Commission's general rules for reconsideration and appeal (47 CFR Part 1). Applicants should have the option of seeking reconsideration of a conditional grant, or of requesting a hearing pursuant to Section 309 of the Act, before deciding whether or not to accept the condition.

In addition to requiring rejection of a condition as the price for seeking reconsideration, the third sentence of Section

22.132(c) sets a 30-day deadline for filing a petition for reconsideration, a redundant provision since the Commission's general procedural rules (e.g., Section 1.106) already contain this deadline. The third sentence of proposed Section 22.132(c) is thus unnecessary, and should be deleted to avoid confusion.

Section 22.135 - Settlement Conferences

While Bell Atlantic does not oppose the concept of settlement conferences as a vehicle to obtain information or discuss issues, the uniform use of such conferences can and does frequently work to the advantage of parties that contest applications on grounds that are beyond the Commission's purview, e.g., parties raising private contractual disputes. A practice of calling settlement conferences as a matter of course, regardless of the issues raised by the contesting party, imposes substantial burdens on Commission staff and applicants. Bell Atlantic urges that these conferences be called only where there are specific issues within the Commission's purview that would benefit from an oral conference. It thus suggests that the first sentence of Section 22.135 be revised as follows:

In any contested application proceeding where the Commission determines that there are issues raised as to Commission Rules or policy which would benefit from a conference, the Commission may direct the parties and/or their attorneys to appear before it for a conference.

Section 22.143 - Construction Prior to Grant of Application

The proposed rule would allow pre-grant construction 90 days after the application has been on public notice. Currently, however, pre-grant construction of major modifications to cellular authorizations is permitted 45 days after public notice. This 45-day "holding period" has not generated problems, and should be retained. Preserving the 45-day period would expedite new service to the public while allowing a full opportunity for parties to oppose the application. Section 22.143(c) should thus be expanded to provide:

Applicants for major modifications of cellular systems may begin construction 45 days after the date of the Public Notice listing the application as tentatively acceptable for filing.

Section 22.144 - Termination of Authorization

This rule would eliminate the existing 30-day reinstatement period for renewal of licenses that permits a licensee to file a renewal application up to 30 days after the license has expired. (See Section 22.44(a)(2).) The reinstatement procedure should be retained. Automatic termination, without the possibility of reinstatement, is unnecessarily harsh. This is particularly true with regard to the cellular service given the current uncertainty over license expiration dates, of which Commission staff is aware.

Section 22.159 - Computation of Average Terrain Elevation

This proposed rule would generally require average terrain elevations to be calculated by computer, but "in cases of dispute, average terrain elevation determinations can also be done

manually, if the results differ significantly from the computer derived averages." On occasion, computer-derived calculations lead to incorrect results due to imperfections in data bases, and may differ from manual calculations. The rule as drafted is unclear as to which method should take priority in that situation. Section 22.159 should make clear that, in cases where there is a discrepancy between computer-calculated and hand-calculated elevations, the latter will be used.

Section 22.303 - Posting Station Authorizations

This section would impose a new rule requiring that "the station call sign must be clearly and legibly marked on every transmitter, other than mobile transmitters, of the station." There is no explanation of this new rule's rationale or purpose. Such a requirement is not, to Bell Atlantic's knowledge, imposed on other Commission licensees. It would be impractical and extremely burdensome, and should be deleted.

First, the proposed rule does not define what "transmitter" means. If the actual transmitter is meant, this would be pointless given that many transmitters are inside buildings or other structures. Bell Atlantic, for example, has installed microcell transmitters in underground and interior locations such as the Fort McHenry Tunnel in Baltimore and Union Station in Washington. In these and other conventional and microcell applications, labeling transmitters would not provide any useful information. If the transmitting antenna is meant, this too would be impractical given typical antenna locations.

The rationale for the rule may have been to give FCC field offices prompt information in the case of an antenna on a structure whose tower lights are inoperative. In that event the rule is overly broad because it includes all transmitter sites. Bell Atlantic suggests that, at a minimum, proposed Section 22.303 be modified to replace the second sentence with the following: "The station call sign must be visible at exterior transmitter sites where the tower structure is required to be lighted by the Commission and/or the Federal Aviation Administration."

Section 22.365 - Antenna Structures; Air Navigation Safety

Bell Atlantic recommends the Commission add a subsection (c) to this rule, to address the use of common radio towers by more than one licensee by permitting one user of a shared tower to assume responsibility for painting and lighting. Section 73.1213(c) of the Rules governing broadcast services permits multiple licensees that share a common radio tower to designate one of the licensees as responsible for painting and lighting the structure, and to keep records as to their agreement. This rule serves the public interest by having all users of the tower clear as to where responsibility lies, and by enabling the Commission to determine promptly which licensee is responsible. The same public interest benefits underlying Section 73.1213(c) apply to the Mobile Radio Services. Bell Atlantic thus proposes that the following provision, modeled on Section 73.1213(c), be added to new Section 22.365:

If a common tower is used for antenna and/or antenna supporting purposes by more than one licensee in the Mobile Radio Services or any other service, each licensee shall be responsible for painting and lighting the structure when obstruction marking and lighting are required by FCC rules. However, each such licensee utilizing a common tower may designate one of the licensees as responsible for painting and lighting the structure. Such designated licensee shall be solely responsible for conforming to all FCC requirements of Part 17 of this Chapter.

Section 22.535 - Effective Radiated Power Limits

The proposed rule establishes a set of maximum effective radiated powers, designated in watts. The Commission requested comment on whether power should instead be designated in decibels above one watt (dBW). Bell Atlantic recommends that measurement in watts as proposed in Section 22.535 be retained. Since present test equipment is designed to measure power in watts, the unit of measurement in Section 22.535 should be the same. Otherwise, manual conversion of test data to conform to a dBW standard would be required, increasing the potential for error and the corresponding risk of system interference.

Section 22.567 - Technical Channel Assignment Criteria

This section would replace the current Carey method of determining harmful interference between co-channel stations with a new set of formulas. While on balance changing to the new formulas is desirable, in some cases there appear to be significant differences in interference contours calculated by each of the two methods. Bell Atlantic has conducted a comparison between the Carey method and the proposed formulas. The results

are detailed in Attachment A of these comments. The three tabulation sheets have assumed arbitrary antenna heights of 1 foot, 50 feet, 98.4 feet (30 meters), 295.3 feet (90 meters), 488.8 feet (149 meters), 495.4 feet (151 meters), and 721.8 feet (220 meters). For each of these heights, an arbitrary ERP of 50, 150, 350, and 500 watts was chosen. The reliable service area contour ("RSAC") and interference contours were then evaluated for each of these conditions. For heights less than the proposed minimum of 30 meters the RSAC computations are within 1 kilometer of each other. However, some of the interference contours for these same heights, calculated by the two methods, differ by as much as 10 kilometers. Moreover, there is a considerable difference in interference contours at the 150 meter breakpoint.

This analysis suggests that the considerable differences in results achieved by the two methods could produced a substantial increase in the number of interference complaints. Bell Atlantic believes this issue warrants a more comprehensive analysis by the Commission and suggests that, following its consideration of initial comments in this proceeding, the Commission consider requesting further specific input on this issue.

Section 22.575 - Use of Mobile Channel for Control Transmitter

The second sentence of this proposed rule appears to exempt certain control transmitters from compliance with the interference protection requirements of Section 22.567(b). This was likely an inadvertent error, since the result would be to potentially permit

such transmitters to cause interference. Bell Atlantic thus recommends that this sentence be deleted.

Section 22.901 - Cellular Service Requirements and Limitations

The second sentence of the proposed rule identifies a few specific circumstances in which cellular service may be refused or terminated. This sentence might be read to preclude refusal or termination of service in other but not listed circumstances, such as a poor credit rating or failure to pay bills. The proposed rule should be expanded to include the following sentence at the end:

In addition, a cellular licensee may refuse or terminate service on reasonable and nondiscriminatory grounds.

In addition, subsection (d)(1) requires 30 days' advance notification before implementing "alternative technology or auxiliary services." While this rule is derived from the advance notice requirement of current Section 22.930, Bell Atlantic believes it is no longer necessary. Since 22.930 was adopted, dozens of alternative technologies and auxiliary services have been implemented without interference or other problems. The Commission has sufficient experience with these services that a lengthy advance notice requirement serves no real purpose, but instead operates to delay licensees from bringing new technologies to the public. Numerous Commission rules (such as frequency coordination requirements) provide adequate protection. Section 22.901(d)(1) should thus be deleted.

At a minimum, this provision should be revised to make clear that the phrase "alternative technology" does not include (1) changing frequencies, (2) switching from analog to digital transmissions, and (3) employing fiber optics as the means of transmitting voice or data communications. These improvements in cellular service have been deployed in the past and will continue to be made in many cellular systems. Requiring a Form 489 for these changes, particularly with a 30-day advance notice requirement, delays and burdens the service provider, and adds paper to the Commission's files, without any countervailing benefit to the Commission or the public.

Section 22.909 - Cellular Markets

The reference to Public Notices for definitions of MSAs and RSAs should include the title and date of the Public Notices to ensure clarity.

Section 22.911 - Cellular Geographic Service Area

Although this rule defines the CGSA with reference to an MSA, it provides no parallel definition for CGSAs with reference to RSAs. This reference needs to be added.

Section 22.927 - Responsibility for Mobile Stations

Bell Atlantic opposes the provisions in this section which purport to impose on cellular carriers responsibility for installation, repair and operation of mobile equipment used by subscribers. These provisions would improperly attempt to

regulate provision of cellular CPE by a cellular carrier and impose on the cellular licensee responsibilities that are not imposed on other CPE providers. Cellular CPE is a competitive market, and all CPE providers should be subject to the same requirements. CPE providers that also happen to be cellular carriers should not be saddled with additional responsibilities for installation, maintenance and repair. This section goes well beyond existing regulation and has not been justified by the Commission in its preamble to the proposed rules. It should be deleted.

Section 22.935 - Procedures for Comparative Renewal Proceedings.

This section appears to be inconsistent with the procedures adopted in the Commission's separate rulemaking proceeding for cellular renewals (CC Docket No. 90-358). In addition, numerous rules adopted in that proceeding are not included in the text of the proposed Part 22 rules attached to the Notice in this rulemaking.

CC Docket 90-358 adopted detailed new procedures for renewals which are set forth in Sections 22.940 through 22.945. While parts of these rules are subject to pending petitions for reconsideration, they are currently in effect and have already been included in Part 22. These rules should be contained in the Part 22 revisions, subject to any revisions the Commission makes in Docket No. 90-358.

Section 22.943 - Limitations on Assignment of Cellular Authorizations

Subsection (c)(2) appears to be reversed. It should, consistent with Commission policy, exclude from the scope of a trafficking inquiry the transfer of cellular authorizations obtained by lottery after commencement of service. Also, the proviso regarding obtaining an authorization through lottery is unclear. If the seller of a constructed and operating cellular system, for example, obtained its authorization through an earlier purchase, rather than by lottery, the Commission would not be concerned with trafficking because the system is built and operating. The rule should therefore be further revised to provide that no trafficking inquiry is required in the case of a constructed and operating system, unless the authorization was obtained by comparative hearing, in which case the minimum operating period would apply.

Section 22.946 - Construction Periods

Subsection (b)(1) is unnecessary under the Commission's rules adopted in CC Docket No. 90-6, because 32 dBu contours now define the CGSA and a licensee has five years to build its market.

Section 22.947 - Five Year Fill-In Period

Subsection (b) deals with contract arrangements to partition an RSA between two or more licensed entities during the five-year fill-in period. The rules should be clarified to reflect the fact that RSAs can also be divided under non-contractual circumstances. The section should also be clarified to reflect the new system

information update public notice and CC Docket No. 90-6 procedures. Finally, the section should be amended to provide that MSA's as well as RSA's can be partitioned.

New Form 401

Bell Atlantic recommends the following revisions to the proposed new Form 401:

(1) Instruction 6 refers to a nonexistent proposed rule, Section 22.6. The reference should probably be to Section 22.105.

(2) The instructions should state the appropriate accuracy requirements for all requested measurements, by requiring height and distance data to be given to the nearest meter and kilometer.

(3) New Form 401 does not include information which is currently requested that is important in determining whether harmful interference would result from the proposed facilities. Items 33e (maximum antenna gain), 33f (maximum ERP), 33j4 (transmitter output power), 35g (aeronautical hazards), and 36 (vertical profile sketch) on the current version of Form 401 call for information that should continue to be provided to the Commission and made available to interested parties. The burden on the applicant in providing this information is minimal.

New FCC Forms 489 and 490

The signature lines for these application should be revised, consistent with new Form 401, to permit signature by an authorized

employee of a corporate applicant, as well as by an officer or director of an applicant.

New Cross-Reference Tables

Appendix C to the Commission's Notice of Proposed Rulemaking contains a table which cross-references the Commission's current rules to the proposed rules. Many times, however, it is necessary to start with a new or revised rule and quickly identify its antecedent rule or rules. A table that cross-references the Commission's new rules to the current rules would thus be useful and should be prepared as part of the Commission's Report and Order in this proceeding.

Respectfully submitted,

THE BELL ATLANTIC COMPANIES

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October 5, 1992

TYPE OF SERVICE		VHF		CONTOUR 37 dBm	
HAAT	ERP watts	CAREY STUDY		FORMULA	
		RSAC	INTER.	RSAC	INTER.
		km		km	
1 FT (or less than 1 FT)	50	1.45	5.47	13.54	40.80
	150	2.09	7.56	17.05	50.27
	350	2.57	9.33	20.37	59.04
	500	2.90	10.30	21.95	63.19
50 FT	50	13.19	42.32	13.54	40.80
	150	16.73	54.38	17.05	50.27
	350	19.95	63.33	20.37	59.04
	500	21.40	70.31	21.95	63.19
98.4 FT/30M	50	13.84	44.41	13.54	40.80
	150	17.54	56.96	17.05	50.27
	350	20.76	68.22	20.37	59.04
	500	22.37	73.37	21.95	63.19
295.3 FT/90M	50	21.88	62.43	21.00	53.12
	150	27.35	74.44	26.45	65.45
	350	32.34	84.47	31.41	76.86
	500	34.75	89.46	34.07	82.27
488.8 FT/149M	50	26.71	69.67	25.70	59.94
	150	32.98	82.70	32.37	73.85
	350	38.78	91.87	38.67	86.73
	500	41.51	96.86	41.68	92.80
493.4 FT/151M	50	26.87	69.99	25.83	67.47
	150	33.15	82.86	32.54	78.71
	350	38.94	92.03	38.88	88.62
	500	41.67	97.02	41.90	93.15
721.8 FT/220M	50	31.05	76.75	30.03	73.33
	150	38.29	89.78	37.82	85.81
	350	44.89	98.31	43.19	96.61
	500	47.63	103.14	48.71	101.55

TYPE OF SERVICE		UHF		CONTOUR 39 dBu	
HAAT	ERP watts	CAREY STUDY RSAC	INTER. km	FORMULA RSAC	INTER. km
1 FT (or less than 1 FT)	50	2.41	6.76	11.56	37.23
	150	3.22	8.37	14.09	43.89
	350	4.02	9.81	16.41	49.85
20 FT	500	14.64	45.37	17.50	52.59
50 FT	50	11.42	34.92	11.56	37.23
	150	14.00	42.80	14.09	43.89
	350	16.25	50.68	16.41	49.85
	500	17.38	54.22	17.50	52.59
98.4 FT/30M	50	11.91	36.20	11.56	37.23
	150	14.48	44.57	14.09	43.89
	350	16.89	52.78	16.41	49.85
	500	18.02	56.32	17.50	52.59
295.3 FT/90M	50	16.73	50.20	16.98	47.94
	150	20.60	59.53	20.70	56.52
	350	23.81	67.74	24.11	64.20
	500	25.42	71.60	25.71	67.72
486.8 FT/149M	50	19.95	57.28	20.26	53.83
	150	24.46	67.58	24.69	63.47
	350	28.48	75.78	28.76	72.09
	500	30.25	79.32	30.68	76.04
495.4 FT/151M	50	20.11	57.60	20.36	53.96
	150	24.46	67.74	24.81	63.63
	350	28.64	75.94	28.90	72.27
	500	30.41	79.48	30.82	76.23
721.8 FT/220M	50	23.01	64.04	23.22	60.64
	150	28.16	74.50	28.30	71.50
	350	32.50	82.38	32.97	81.21
	500	34.43	86.24	35.16	85.67